

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BASF CORPORATION,)
vs.)
Plaintiff,)
AUTOMALL AUTO BODY, LLC d/b/a FIX)
AUTO HENDERSON, KTI LLC d/b/a)
AMERICAN AUTO BODY, FIX NORTH LLC)
d/b/a FIX AUTO LAS VEGAS NORTH, FIX)
NORTH LLC d/b/a FIX AUTO-CRAIG ROAD,)
AND JEFFERSON BAGLEY,)
Defendants.)
Case No. 2:20-cv-01080-RFB-NJK

**STIPULATION AND ORDER TO EXTEND SUMMARY JUDGMENT OPPosition
DEADLINES (FIRST REQUEST FOR AN EXTENSION)**

Plaintiff BASF Corporation (“BASF”), by the undersigned counsel and with the consent of Defendants Automall Auto Body, LLC KTI LLC, and Fix North LLC (together “Fix Auto”) and Jefferson Bagley (“Bagley”) (collectively “Defendants”), hereby respectfully submits this stipulation to extend the response deadline for Plaintiff to oppose Defendants’ motion for partial summary judgment, making the new response/opposition deadline June 23, 2021.

1. The original response/opposition deadline is Tuesday, June 1, 2021.
 2. The parties recently reopened settlement negotiations and are making a good faith attempt to negotiate a resolution.
 3. This motion is made in good faith and not for the purposes of undue delay. The opposition deadline has not been extended previously, and the requested extension will allow the parties time to conduct good faith settlement discussions to see if a resolution can be reached without having to burden the Court with motion practice.

1 WHEREFORE, Plaintiff, with the consent of Defendants, hereby moves and stipulates to
2 extend the response deadlines for Plaintiff's opposition to Defendants' motion for partial summary
3 judgment, making the response/opposition deadline June 23, 2021:
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	Old Deadline	New Deadline
Plaintiff's Deadline to Respond to Defendants' Motion for Partial Summary Judgment	June 1, 2021	June 23, 2021
Defendants' Reply Deadline		July 14, 2021

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10 **IT IS SO ORDERED**
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13 **RICHARD E. BOILWARE, II**
14 **United States District Court**
15 DATED this 30th day of May, 2021.
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1 Respectfully Submitted This 28th day of May, 2021:

2 WE ASK FOR THIS:

3 JEFFERSON BAGLEY
4 AUTOMALL AUTO BODY, LLC
5 KTI, LLC
6 FIX NORTH, LLC

7 By: /s/ Michael C. Whitticar
8 *Counsel*
9 Michael C. Whitticar (VSB No. 32968)
10 NOVA IP Law, PLLC
11 7420 Heritage Village Plaza, Suite 101
12 Gainesville, VA 20155
13 Tel: 571-386-2980
14 Fax: 855-295-0740
15 E-mail: mikew@novaiplaw.com
16 *Counsel for Defendants*
17 *Admitted Pro Hac Vice*

18 By: /s/ Peter R. Pratt, Esq.
19 *Counsel*
20 Peter Pratt (NSB No. 6458)
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23 Henderson, NV 89074
24 T: (702) 451-2055
25 Email: peter@sterlingkerrlaw.com
26 *Local Counsel for Defendants*

27 SEEN AND AGREED TO:

28 BASF CORPORATION

29 By: /s/ Edgar Carranza, Esq.
30 *Counsel*
31 Edgar Carranza, Esq.
32 Nevada State Bar No. 5902
33 Backus, Carranza & Burden
34 3050 S. Durango Drive
35 Las Vegas, NV 89117
36 (702) 872-5555
37 (702) 872-5545 facsimile
38 ecarranza@backuslaw.com
39 *Attorney for Plaintiff BASF Corporation*

CERTIFICATE OF CONFERRAL

I hereby certify that I conferred in good faith with Defendant's counsel regarding the foregoing Stipulation for an Extension of Time and Defendant's counsel agreed to the requested extension.

/s/ Edgar Carranza, Esq.
Edgar Carranza

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May, 2021, the foregoing Stipulation to Extend time was served by the following counsel of record by CM/ECF submission which will send a notification to the following counsel of record:

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/s/ Patti Sherretts
An employee of Backus, Carranza & Burden